

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION

Regarding

	)	
In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Telecommunications Carriers Eligible for	)	WC Docket No. 09-197
Universal Service Support	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
	)	

Comments of Common Cause

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## I. INTRODUCTION

On behalf of Common Cause's more than 400,000 members and supporters, we write to support the Federal Communications Commission's (FCC) modernization of the Lifeline program to include broadband Internet services. Modernizing Lifeline to support broadband connectivity would deliver dramatic economic, social, and civic benefits. Properly executed, Lifeline modernization would do more in one fell swoop to narrow the digital divide than any other single federal policy initiative currently under consideration.

We note our support of the recent Lifeline Principles Letter<sup>1</sup> by highlighting three key areas. First, modernizing Lifeline to include broadband Internet services would promote universality by helping to bridge the "Homework Gap." Today, seven in ten teachers assign homework that requires Internet access, and nearly one in three children lack broadband access at home.<sup>2</sup> Commissioner Rosenworcel labeled the area where these numbers overlap the Homework Gap, extending Lifeline to include broadband Internet services would help bridge it.<sup>3</sup> Second, modernizing Lifeline would foster innovation and competition and strengthen the economy, as more Americans would have access to online job applications and e-government services. Third, it would provide transparency and contribute to the development of a more informed and engaged electorate by delivering access to new online political forums. The future of communications lies in reliable connectivity to broadband Internet, and it is essential that the FCC capitalize on this unique chance to bring that power to all Americans.

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<sup>1</sup> *Lifeline Principles Letter*, The Leadership Conference on Civil and Human Rights, to Chairman Wheeler, 6/10/15; <http://www.civilrights.org/advocacy/letters/2015/lifeline-principles-letter.html>.

<sup>2</sup> *Bridging the Homework Gap*, Jessica Rosenworcel; [http://www.huffingtonpost.com/jessica-rozenworcel/bridging-the-homework-gap\\_b\\_7590042.html](http://www.huffingtonpost.com/jessica-rozenworcel/bridging-the-homework-gap_b_7590042.html); June 15, 2015.

<sup>3</sup> *Id.*

## **II. BROADBAND INTERNET ACCESS IS ESSENTIAL TO PARTICIPATE IN AMERICAN SOCIETY.**

- A. Lack of broadband Internet access contributes to the Homework Gap, and children without broadband access at home are less likely to excel in school.

Access to broadband Internet services may be affected by multiple demographic factors, including gender, socioeconomic status, age, and disability.<sup>4</sup> Internet communication technology is an essential part of both academic achievement and obtaining employment. Connectivity and opportunity are intimately linked, and closing the Homework Gap means more young people entering the workforce prepared for employment.<sup>5</sup> The urgency of this reform will grow because by the year 2020, when an estimated 77% of jobs in the US will require Internet proficiency.<sup>6</sup>

As Commissioner Rosenworcel has highlighted, American students are most likely to use a smartphone to complete a homework assignment as compared with students within other developed nations.<sup>7</sup> In the United States, 50% of students report being unable to complete a homework assignment because of lack of high-speed access or a computer. Nationally, 42% of students say they received a lower grade on an assignment because they did not have access to the Internet.<sup>8</sup>

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<sup>4</sup> Strover, S. (2014) The US Digital Divide: A Call for a New Philosophy. Critical Studies in Media Communication; 31: 2., Ames, Morgan G., et al. "Understanding Technology Choices and Values through Social Class.", Proceedings of the ACM 2011 conference on Computer supported cooperative work. 1958834: ACM, 2011. Print.

<sup>5</sup> McKenzie, K. "Digital Divides: The Implications for Social Inclusion." Learning Disability Practice 10.6 (2007): 16-21. Print.

<sup>6</sup> Saunders, NC. (2014) A summary of BLS projections to 2014. Web. <http://www.bls.gov/opub/mlr/2005/11/art1full.pdf>.

<sup>7</sup> Rosenworcel, Jessica. "Remarks of Commissioner Jessica Rosenworcel Taking the Pulse of the High School Student Experience in America Hispanic Heritage Foundation Washington, Dc April 29, 2015." 2015. Web 2015.

<sup>8</sup> Foundation, Hispanic Heritage. "Taking the Pulse of the High School Student Experience in America." Trans. Perry, Joan. Ed. myCollegeOptions2015. Ed. Institute, Family Online Safety. Print.

The Homework Gap disproportionately affects historically marginalized groups, reinforcing existing socioeconomic barriers that already threaten the economic stability of the United States. According to Pew Research Center, some 5 million households with school-age children do not have high-speed Internet service at home.<sup>9</sup> Living in a poor neighborhood is correlated with Internet access disparities; low-income teens without computer-based home Internet are more likely than their wealthier peers to report using their cell phones to go online.<sup>10</sup> Low-income households – and especially black and Hispanic ones – make up a disproportionate share of that 5 million.<sup>11</sup>

Nearly 80% of Hispanic and African American students without access to a computer at home report using their smartphones to complete homework assignments.<sup>12</sup> Black youth are less likely than peers from other ethnic and racial groups to use the Internet from a home computer and are more likely to use the Internet from a cell phone.<sup>13</sup> Hispanic populations in the U.S. experience substantial and multiple barriers for home access, citing cost, interest, and skill as reasons for not using the Internet.<sup>14</sup> Hispanic youth are the most likely to have been unable to complete an assignment due to lack of Internet access.<sup>15</sup> Hispanic youth were also

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<sup>9</sup> Internet and Life, Pew. "The Numbers Behind the Homework Gap." 2015. Web.

<sup>10</sup> Brown, K., Campbell, S. W., & Ling, R. (2011). Mobile Phones Bridging the Digital Divide for Teens in the US? *Future Internet*, 3(2), 144-158. (Mossburger, too)

<sup>11</sup> Lee, E. B. "Facebook Use and Texting among African American and Hispanic Teenagers an Implication for Academic Performance." *Journal of Black Studies* 45.2 (2014): 83-101. Print. See Also, Tripp, Lisa M. "'The Computer Is Not for You to Be Looking around, It Is for Schoolwork': Challenges for Digital Inclusion as Latino Immigrant Families Negotiate Children's Access to the Internet." *New Media & Society* 13.4 (2011): 552-67. Print. And, Tynes, Brendesha M., and Kimberly J. Mitchell. "Black Youth Beyond the Digital Divide: Age and Gender Differences in Internet Use, Communication Patterns, and Victimization Experiences." *Journal of Black Psychology* 40.3 (2014): 291-307. Print.

<sup>12</sup> Gonzales, A. L. "Health Benefits and Barriers to Cell Phone Use in Low-Income Urban U.S. Neighborhoods: Indications of Technology Maintenance." *Mobile Media & Communication* 2.3 (2014): 233-48. Print.

<sup>13</sup> McKenzie, K. "Digital Divides: The Implications for Social Inclusion." *Learning Disability Practice* 10.6 (2007): 16-21. Print.

<sup>14</sup> (Mossberger et al., 2012)

<sup>15</sup> Foundation, Hispanic Heritage. "Taking the Pulse of the High School Student Experience in America." Trans. Perry, Joan. Ed. myCollegeOptions2015. Ed. Institute, Family Online Safety. Print.

found to be the most likely to report receiving a lower grade due to not having access to the Internet.<sup>16</sup>

## B. Inclusively Extending Lifeline to Broadband

Common Cause supports empowering qualifying households with maximal choice; some will prefer a traditional wired or wireless benefit, others will choose broadband support. Among broadband options, different modal connections – wired broadband, mobile wireless through a phone or tablet, or a hotspot – offer different Internet experiences. The FCC should acknowledge the technological limitations and strengths of each while transitioning the Lifeline program to maximize choice for beneficiaries. Doing so will enable qualifying households to access communications in the way that best meets their economic, social, educational, and civic needs.

Research suggests mobile Internet access can narrow the gap between technologically rich demographics and those that are technologically lean.<sup>17</sup> However, there are differences between those with home Internet and those who only use mobile devices to access the Internet. While mobile devices allow individuals avenues to get online, the difference between mobile and PC Internet users can reinforce inequities in digital skill sets.<sup>18</sup> Some large mobile devices may not be practical for creating a resume or completing a job application. Further, cost barriers from cell phone plans that maintain high monetary rates for cellular data usage burden those using

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<sup>16</sup> *Id*

<sup>17</sup> Martin, S. P. "Is the Digital Divide Really Closing? A Critique of Inequality Measurement in a Nation Online." *IT & Society* 1.4 (2003): 1-13. Print. And, Wei, R. "Mobile Media: Coming of Age with a Big Splash." *Mobile Media & Communication* 1.1 (2013): 50-56. Print.

<sup>18</sup> Napoli, Philip M., and Jonathan A. Obar. "The Emerging Mobile Internet Underclass: A Critique of Mobile Internet Access." *Information Society* 30.5 (2014): 323-34. Print.

mobile devices. Since those who predominantly use cell phones to go online are from low-income households, those with the least money are paying the most for the Internet.<sup>19</sup>

C. Lack of broadband Internet access negatively affects the U.S. economy.

*1. Jobs – Restricting access restricts the economy.*

Online commerce, education, and telemedicine are all promising horizons for economic growth. Multiple studies demonstrate a correlation between a robust economy and broadband penetration.<sup>20</sup> Broadband access enhances growth and economic performance.<sup>21</sup> Employment, particularly in the service sector, is positively affected by the presence of broadband.<sup>22</sup> World Bank research indicates that for developed countries, a 10-percentage-point rise in broadband penetration adds a 1.21-percentage point rise in economic growth.<sup>23</sup>

A 2013 White House report identified the sweeping benefits of broadband Internet and the diverse ways the Internet has the potential to grow the American economy:

“To create jobs and grow wages at home, and to compete in the global information economy, the delivery of fast, affordable and reliable broadband service to all corners of the United States must be a national imperative. The build-out of broadband infrastructure itself is a major driver of American investment and job creation, but even more significant are the ways that connectivity is transforming a range of industries, from education to entertainment to agriculture to travel. High-speed wired and wireless networks

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<sup>19</sup> Brown, K., Campbell, S. W., & Ling, R. (2011). Mobile Phones Bridging the Digital Divide for Teens in the US? *Future Internet*, 3(2), 144-158. Horrigan, John B. "What Are the Consequences of Being Disconnected in a Broadband-Connected World?" *Daedalus* 140.4 (2011): 17-31. Print.

<sup>20</sup> Maldoom, D., R.A. Marsden, J.G. Sidak, and H.J. Singer. 2005. Broadband in Europe: How Brussels can wire the information society. New York: Springer., Kolko, J. 2012. Broadband and local growth. *Journal of Urban Economics* 71: 100–113., Crandall, R.W., W. Lehr, and R. Litan. 2007. The effects of broadband deployment on output and employment: A cross-sectional analysis of U.S. data. *Issues in Economic Policy* 6: 1–34.

<sup>21</sup> Gillett, S.E., W. Lehr, C.A. Osorio, and M.A. Sirbu. 2006. Measuring the economic impact of broadband deployment. [http://cfp.mit.edu.ezproxy.lib.utexas.edu/publications/CFP\\_Papers/Measuring\\_bb\\_econ\\_impact-final.pdf](http://cfp.mit.edu.ezproxy.lib.utexas.edu/publications/CFP_Papers/Measuring_bb_econ_impact-final.pdf)

<sup>22</sup> Crandall, R.W., W. Lehr, and R. Litan. 2007. The effects of broadband deployment on output and employment: A cross-sectional analysis of U.S. data. *Issues in Economic Policy* 6: 1–34.

<sup>23</sup> Kolko, Jed, 2012. "Broadband and local growth," *Journal of Urban Economics*, Elsevier, vol. 71(1), pages 100-113., World Bank Statistics, 2009.

place the United States at the center of a digital economy that is one of the brightest parts of our short-term recovery and long-term competitiveness.”<sup>24</sup>

The report also states that the “App Economy” is one of America’s most dynamic sectors, creating more than 500,000 U.S. jobs since 2007.

The United States also displays an extraordinarily high percentage of jobholders who are also Internet users; Pew Research shows that 94% of jobholders in the United States are also Internet users, suggesting that Internet proficiency and employment go hand in hand.<sup>25</sup> Increasingly, the United States must compete in an economically globalizing market. To remain competitive, the U.S. must have a connected citizenry. Despite this, the US ranks 20th in the world for home broadband penetration.<sup>26</sup> The Internet is integral for seeking and completing education, searching for work, job training, connecting with professional networks, and communicating electronically with employers in the form of email or telecommuting for interviews or other routine correspondence. The importance of broadband in finding and keeping employment is clear: Americans view those without broadband access as being “most disadvantaged” when it comes to job and career opportunities.<sup>27</sup> Modernizing Lifeline to include broadband shrinks this disadvantage and extends pathways to gainful employment for those who need it most.

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<sup>24</sup> [https://www.whitehouse.gov/sites/default/files/broadband\\_report\\_final.pdf](https://www.whitehouse.gov/sites/default/files/broadband_report_final.pdf)

<sup>25</sup> PURCELL, Kristen, and Lee RAINIE. "Technology's Impact on Workers." Pew Charitable Trust 2014. Web.

<sup>26</sup> "The State of Broadband 2013: Universalizing Broadband." the Broadband Commission 2013. Web. <http://www.broadbandcommission.org/Documents/bb-annualreport2013.pdf>

<sup>27</sup> Smith, Aaron. "Attitudes Towards Broadband and Broadband Investment." Pew Charitable Trust 2010. Web. <http://www.pewinternet.org/2010/08/11/attitudes-towards-broadband-and-broadband-investment/>



## *2. Social Services – Health*

The expanded health insurance marketplace created by the Affordable Care Act seeks to serve all Americans in providing insurance at reasonable and fair rates. Shopping for health care providers without Internet access can make finding appropriate coverage frustrating and difficult. For those with no home broadband who rely on public computing centers such as libraries, both time limits and privacy concerns hamper the search for coverage.

Health and broadband penetration are linked, and extending Lifeline to cover broadband would promote cost-effective pro-health environments among at-risk populations. People living with chronic conditions are significantly less likely than other adults to have Internet access. Furthermore, 34% of Americans see a lack of broadband access as a major disadvantage to getting information related to prevention and health services. Telemedicine over broadband stands to reap an estimated cost savings between 10-20%.<sup>28</sup>

The Connect2Health task force is one example where telemedicine over broadband is already manifesting savings and promoting health. Connect2Health has a goal of improving access to health care services via broadband regardless of socio-economic background or geographic location.<sup>29</sup> The value of broadband-enabled health initiatives through the Connect2Health proves the value of broadband for a healthy American populace. A recent visit by the Connect2Health taskforce to Jackson and Sunflower Counties in Mississippi illustrates the importance of connecting the unconnected. The rural town of Ruleville, MS is undertaking broadband enabled health interventions as a part of a multi-stakeholder task force. Ruleville has a patient-to-doctor ratio of more than 3000:1, constraining residents of Ruleville already facing

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<sup>28</sup>UNESCO. "Broadband: A Platform for Progress." UNESCO Broadband Commission 2010. Web.

<sup>29</sup>"FCC's Connect2health Task Force Focuses on Broadband Connectivity and Rural Telehealth in Jackson and Sunflower County, Mississippi." Beyond the Beltway Series. Federal Communication Commission 2014. Web. [https://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2014/db1201/DOC-330739A1.pdf](https://transition.fcc.gov/Daily_Releases/Daily_Business/2014/db1201/DOC-330739A1.pdf)

intersectional adversity. Compounding lengthy distances traveled to doctor visits, 58% of Ruleville's children live in poverty and come from homes where parents cannot skip work to take a child for a four-hour round trip to a doctor appointment. The public health situation in Ruleville is dire as 44% of the children are obese.

To combat these barriers to a healthy lifestyle, Ruleville adopted "just-in-time" communication between patients and doctors on specialized tablet computers. This pilot program brings the resources and expertise of the state's only academic medical center, University of Mississippi Medical Center, to citizens of rural Mississippi, rather than requiring them to travel hours to UMMC. Through the implementation of remote glucose monitoring, weight monitoring, and preventative care in patient-to-doctor real time connections, the intervention on diabetic populations has resulted in a 90% improvement on diabetes-related hospitalizations.<sup>30</sup> Broadband saves providers and patients from the burden of unnecessary health-related costs and further, saves lives.

### *3. Veterans and active duty servicepersons depend on the Internet for crucial government services.*

Affordable Internet connects low-income veterans to online Veterans Affairs (VA) services. These services are vital and include applying and checking the status of benefits, scheduling medical appointments and ordering medication. For vets with broadband access, these online interfaces result in fewer unnecessary trips to the VA. For vets that may live considerable distances from a VA facility, access means cost savings and efficiency for both VA operations and veterans themselves. Another broadband innovation serving veterans is the

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<sup>30</sup> Ellison, Michelle P. "Just around the Broadband Bend." <https://www.fcc.gov/blog/just-around-broadband-bend> February 23, 2015. Web.

eArmyU program that allows those in the military to earn academic credits while serving.<sup>31</sup> The service is wholly online and all credits carry over to civilian life. The Army, however, does not provide Internet access for veterans home who have finished their service. Therefore, low-income servicepersons without Internet at home may face difficulty completing an online degree they have partially completed once they are no longer on active duty.

The Internet allows many veterans to access private treatment for Posttraumatic Stress Disorder (PTSD) and other mental health problems. Vets Prevail is one example of an organization that provides diverse intervention services online. Through the use of social networks, mobile applications, and webpage interfaces, Vets Prevail has yielded positive results in PTSD and depression treatment. It offers avenues for coping with the transition to civilian life, fostering social connections, and accessing medical services.<sup>32</sup> This is just one example - there is a vast online support network available to address veterans' mental health, social, and therapeutic needs that extend beyond the scope of VA services, and affordable broadband Internet is necessary to guarantee reliable access to these networks.

Right now, many veterans lack access to reliable broadband Internet and must resort to public libraries and community centers to get online.<sup>33</sup> A digital divide exists between veterans with severe mental illnesses and the general population of servicepersons.<sup>34</sup> As more health-based intervention moves online, this disparity will grow – resulting in a vicious cycle of isolation and disconnection from the resource network.

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<sup>31</sup> Tom Halligan, "The Student Soldier," 24, *Community College Journal*, (August 2007).

<sup>32</sup> "Vets Prevail," Prevail Health Solutions, accessed June 29, 2015, <http://www.vetsprevail.org>, Stevan E. Hobfoll et al., "Project Veterans' Empowerment Over Stress Trial: Does Vets Prevail Empower Veterans And Improve Their Lives?" [https://www.vetsprevail.org/resources/VP\\_Report\\_FINAL\\_22\\_Nov\\_13.pdf](https://www.vetsprevail.org/resources/VP_Report_FINAL_22_Nov_13.pdf). Prevail Health Solutions, November 22, 2013. June 29, 2015.

<sup>33</sup> "Internet Usage and Broadband Usage Report," <http://www.internetworldstats.com/am/us.htm>. Internet World Stats, June 2nd, 2014. June 29th, 2015.

<sup>34</sup> Keith D. McInnes et al., "Disparities in Health-Related Internet Use by US Veterans: Results from a National Survey," *Informatics in Primary Care* 18, no. 1 (2010).

At the heart of the connectivity problem, rural veterans, like other rural residents, lag behind others in broadband Internet penetration.<sup>35</sup> As such, rural veterans are the least likely to use the Internet for health purposes and are most affected by a lack of access. Rural veterans are also isolated from the cohort of servicepersons in more populated areas. This isolation may negatively affect long-term health and readjustment to civilian life.

For deployed servicepersons, Internet access back at home is often vital for family members. Daily communication via email or webcam between a deployed serviceperson and a spouse back home helps normalize relationships and significantly reduces domestic conflict. Interacting with long-term romantic partners, families, and spouses also eases transitions back to family and civilian life.<sup>36</sup>

In sum, veterans, active duty servicepersons, and their families rely on broadband Internet services during deployment and after, and extending Lifeline to include broadband Internet services would go a long way in helping our nation's heroes and heroines. First, many VA programs are accessible online, and a reliable, fast, home broadband Internet connection means fewer trips to the VA office, ultimately making many lives much easier. This includes online programs designed specifically to help veterans cope with PTSD. Second, programs like eArmyU exist entirely online, and without broadband access back at home, many veterans have trouble completing their online degrees once they return home. Third, veterans located in rural areas have even more difficulty accessing home broadband, which may raise long-term health risks. Finally, broadband at home is often a vital communication tool between deployed servicepersons and their families and helps normalize relationships and significantly reduces

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<sup>35</sup> "Internet Usage and Broadband Usage Report," <http://www.internetworldstats.com/am/us.html>. Internet World Stats, June 2<sup>nd</sup>, 2014. June 29<sup>th</sup>, 2015.

<sup>36</sup> Andy J. Merolla, "Relational Maintenance during Military Deployment: Perspectives of Wives of Deployed US Soldiers," *Journal of Applied Communication Research* 38, no. 1 (February 2010).

domestic conflicts. Broadband access at home is a boon to veterans and active-duty military personnel, and the Lifeline program should embrace broadband extension for this reason.

### **III. EXTENDING LIFELINE TO INCLUDE BROADBAND SERVICES WOULD FOSTER AN INFORMED AND ENGAGED ELECTORATE.**

Americans communicate digitally today more than ever before, and the pervasiveness of the Internet as a tool for communication is widespread and growing. Whereas the public square historically served as a forum for public discourse, the Internet and its myriad chat rooms, blogs, news sites, and social media tools now provides that mechanism. For example, in the presidential elections of 2008 and 2012, political organizers turned to the Internet to engage record numbers of citizens, and trends point toward even more online organizing in 2016. American citizens have a right to be informed about elections and a right to engage with the political process. With ever more of the political process occurring online, access to reliable broadband Internet is essential to fostering an informed and engaged electorate. Several Common Cause state chapters have supported the ratification and implementation of online voter registration. Lifeline modernization promises to facilitate increased voter registration and bring ever more people into the process of self-government.

#### **A. Extending Lifeline to include broadband services ensures all have access to e-Government services.**

Through the creation of the Office of E-Government & Information Technology and the enactment of the E-Government Act of 2002 the federal government recognizes the utility of the Internet to make services like voter registration more available to the public. The language in the E-Government Act reflects the unbounded potential for the Internet “To promote the use of the

Internet and other information technologies to provide increased opportunities for citizen participation in Government.”<sup>37</sup> As public services move online, it is necessary to connect all citizens with the opportunity to exercise their basic constitutional rights. Currently, 46 states and the District of Columbia are moving forward with modernizing registration legislature to include electronic avenues for voter registration. There are 30 states that currently offer online voter registration and that number will only continue to grow.<sup>38</sup>

Furthermore, expanded access enhances the accountability and transparency of governance. Stakeholders have exponentially utilized federal forums like those provided by the White House and the FCC, through online petitions, comments, and electronic correspondence to contribute to the democratic process. In fact, 14 million users have signed 21 million petitions at the White House’s citizen engagement site “We The People.”<sup>39</sup> The 2015 Open Internet Order followed an unprecedented 3.7 million online comments to the FCC. Other recent examples of mass online stakeholder engagement include an EPA rulemaking on mercury emissions<sup>40</sup>, and the Forest Service’s rulemaking proceedings to ban roads in wilderness areas. A U.S. Department of Agriculture query on organic foods rulemaking amassed more than a quarter of a million comments.<sup>41</sup>

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<sup>37</sup> E-GOVERNMENT ACT OF 2002, PL 107-347, December 17, 2002, 116 Stat 2899, Meijer, Albert. "E-Governance Innovation: Barriers and Strategies." *Government Information Quarterly* 32.2 (2015): 198-206. Print.

<sup>38</sup> "Voter Registration Modernization in the States." Brennan Center for Justice at the New York University School of Law, 2015. Print. <http://www.brennancenter.org/analysis/voter-registration-modernization-states>

<sup>39</sup> Ezra Mechaber, Making We The People More User-Friendly Than Ever, THE WHITE HOUSE BLOG (June 25, 2014)

<sup>40</sup> Schlosberg, David, Stephen Zavestocki, and Stuart Shulman. 2005. 'To Submit a Form or Not to Submit a Form, That is the (Real) Question': Deliberation and Mass Participation in U.S. Regulatory Rulemaking, paper presented at the annual meeting of the Western Political Science Association, Oakland, CA, March 17-18.

<sup>41</sup> Shulman, Stuart W. 2003. An Experiment in Digital Government at the United States National Organics Program. *Agri. and Hum. Val.* 20: 253-265.

- B. Extending Lifeline to include broadband services would help more constituents gain access to new forums for political debate

Voters rely on the Internet to inform themselves about public affairs, civic concerns, and electoral choices. The Internet represents the growth of a new forum for ideas as newspaper and television consumption in the United States declines.<sup>42</sup> Further, advocates have direct contact with their citizens via this powerful medium, encouraging communication in real-time on pressing issues. Elections are now contingent upon how candidates reach out and inform the electorate via the Internet.<sup>43</sup> The Internet's value to the public is clear; the Internet is increasingly how candidates inform, reach out, fundraise, and spread campaign messages to voters.

Expanding access to broadband for low-income constituents broadens the plurality of citizen voices in an electronic marketplace of ideas. Blog posts, web content, information seeking, and posting and connecting on social networking sites are all avenues to express political views. In fact, Internet use is correlated to political participation, and further, is linked with civic engagement.<sup>44</sup> As of 2012, 66% of Americans using social networking sites have engaged in civic or political activities and 25% of subscribers to social networking sites say they

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<sup>42</sup> See Pew Research Center, Daily Number: Number of Americans Who Read Print Newspapers Continues Decline (Oct. 11, 2012), <http://www.pewresearch.org/daily-number/number-of-americans-who-read-print-newspaperscontinues-decline/>; see also PEW RESEARCH CENTER, STATE OF THE NEWS MEDIA, NEWSPAPERS: BY THE NUMBERS (2013), available at <http://stateofthemedias.org/2013/newspapers-stabilizing-but-still-threatened/newspapers-by-the-numbers/>; PEW RESEARCH CENTER, STATE OF THE NEWS MEDIA, LOCAL TV: AUDIENCE DECLINES AS REVENUE BOUNCES BACK (2013), available at <http://stateofthemedias.org/2013/local-tv-audience-declines-as-revenuebounces-back/>; Pew Research Center, Fact Tank: Local TV Audiences Bounce Back (Jan. 28, 2014), <http://www.pewresearch.org/fact-tank/2014/01/28/local-tv-audiences-bounce-back/> (Evidencing how a minor uptick in viewership is still overshadowed by greater overall decline over time).

<sup>43</sup> Pew Research Center's Journalism Project Staff, How Presidential Candidates Use the Web and Social Media, PEW RESEARCH JOURNALISM PROJECT (Aug. 15, 2012), <http://www.journalism.org/2012/08/15/howpresidential-candidates-use-web-and-social-media/> ("In 2012, in short, voters [played] an increasingly large role in helping to communicate campaign messages, while the role of the traditional news media as an authority or validator has only lessened").

<sup>44</sup>M. KENT JENNINGS and VICKI ZEITNER Internet Use and Civic Engagement: A Longitudinal Analysis Public Opinion (2003) 67 (3): 311-334

have become increasingly active after being exposed to political subjects.<sup>45</sup> Some users also report shifting or evolving political views after utilizing the public exchange of ideas that the Internet promotes.<sup>46</sup>

#### **IV. THE FCC SHOULD MAXIMIZE THE BENEFITS OF LIFELINE.**

Extending Lifeline to include broadband Internet services will help millions of people become active participants in the digital world. Nowadays, a high-speed connection to the Internet is integral to take part in society, and the Internet is the forum for public debate. Its influence on our lives will only grow. In order to ensure that every American is guaranteed a chance to succeed in this rapidly changing digital world, the FCC must maximize the benefits of extending Lifeline to include broadband Internet services.

- A. The FCC should avoid verification procedures that bar eligible households from utilizing the Lifeline program.

The FCC was created, “So as to make available, so far as possible, to all the people of the United States... a rapid, efficient, Nation-wide, and world-wide, wire and radio communication service....”<sup>47</sup> This is a lofty and rational goal. The more people connected to the Internet the better: it connects people to other people, and the more people that are online, the more robust the network becomes. Accordingly, *the FCC should not cap Lifeline* or impose a budget.

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<sup>45</sup> Aaron Smith, Civic Engagement in the Digital Age, PEW RESEARCH INTERNET PROJECT (April 25, 2013), <http://www.pewInternet.org/2013/04/25/civic-engagement-in-the-digital-age/>.

<sup>46</sup> Lee Rainie and Aaron Smith, Politics on Social Networking Sites, PEW RESEARCH INTERNET PROJECT (Sept. 24, 2012), <http://www.pewinternet.org/2012/09/04/politics-on-social-networking-sites/> (“16% of SNS users say they have changed their views about a political issue after discussing or reading posts about it on SNS”).

<sup>47</sup> Communications Act of 1934, 47 U.S.C. 151(1).



A budget would unnecessarily exclude eligible subscribers beyond an arbitrary cut-off point. That would obviously hurt otherwise eligible subscribers. To maximize the benefits of Lifeline modernization, the FCC should not cap the program and should first allow the maximum number of potential subscribers to enroll. Even a “flexible cap,” whereby the FCC would have the power to adjust the cap based on real-world data, is unworkable because it is inconsistent with a needs-based, counter-cyclical program. Further, the FCC should not impose co-payments on subscribers. For low-income households, co-payments represent a significant barrier that will prevent the maximum number of subscribers from joining.

The FCC should not impose a cap or co-payment requirements. This will ensure that the people who stand to gain the most from Internet connectivity – low-income school children, jobseekers, and disabled veterans – will maximally realize the benefits.

- B. The FCC should continue to employ broadly inclusive eligibility standards while still working to minimize waste, fraud, and abuse.

Common Cause has supported the FCC’s efforts to reform Lifeline, and the Commission should allow these reforms to continue to work. In just two years, and by implementing just a few simple eligibility reforms, the overall cost of the Lifeline program was cut almost \$600 million, from \$2.2 billion to \$1.6 billion.<sup>48</sup> Reforms also eliminated LinkUp subsidies for new connections (except on Tribal Lands), which were acting as unnecessary bounties for new sign-ups. As a result, LinkUp expenditures dropped from \$14 million per month to less than \$200,000.<sup>49</sup> These reforms are working. Of course, reasonable

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<sup>48</sup> 2014 Annual Report, Universal Service Administrative Company, pg 8-9; [http://www.usac.org/\\_res/documents/about/pdf/annual-reports/usac-annual-report-2014.pdf](http://www.usac.org/_res/documents/about/pdf/annual-reports/usac-annual-report-2014.pdf).

<sup>49</sup> See Lifeline: Promoting Telephone Subscribership on Tribal Lands, FCC Guide, updated April 8, 2014; <https://www.fcc.gov/guides/promoting-telephone-subscribership-tribal-lands-0>; see also FCC Reports on Major Reforms to Lifeline Program, released February 12, 2013; <https://www.fcc.gov/document/fcc-reports-major-reforms-lifeline-program>.

opportunities to eliminate waste, fraud, and abuse should be explored, but the 2012 reforms should be given time to take shape. Capping Lifeline or imposing a co-payment policy would hamstring the program and prevent those that need it the most from maximally realizing its benefits.

### c. Functional Tests

At this time Common Cause does not suggest a specific minimum bandwidth for support; instead, we urge the Commission to apply a series of real-world, functional tests to determine minimum supported connectivity. Steady innovation means new online applications require ever-changing minimum bandwidth levels. A set minimum speed may be quickly obviated by technological advance.

Rather, we recommend the Commission examine common use cases such as whether supported devices and modalities are sufficient for popular web applications. Additionally, we encourage the Commission to ensure that whatever connectivity is supported be sufficient to keep up with the web applications described above including online voter registration, online veterans' services, online employment resources, and online educational services.

## V. CONCLUSION

Lifeline has brought essential communications technology to communities in need for three decades. Through the transition from landline telephony to the rapidly-changing world of mobile technology, Lifeline stands to provide low-income school children, jobseekers, and disabled veterans, among others with the tools necessary to compete. Those tools change daily. School children need access to broadband in order to complete assignments; many employers post job applications online and nowhere else; and many services for veterans can

be found only online. Broadband access is essential to fulsome participation in American society

Extending Lifeline to include broadband services would also foster a more informed and engaged electorate. Political forums are increasingly found online, and many states offer online voter registration services. E-government services, such as health care and many services for veterans, would be more effective if more people had access to them.

The FCC has a golden opportunity to enhance democratic participation. Optimally extending Lifeline to include broadband services will make it possible for more people to participate in building a stronger society.